DfE Logo Pilot for Disinfectants

April 2, 2009

Discussion Points

- Background
- Previous Products
- Issues That Arose
- Draft – Facts to Consider
- Next Steps

Background

- Currently, products that make cleaning claims are permitted to apply for the Design for the Environment “logo” once they’ve completed their review.
- Most of the antimicrobial hard, non-porous surface disinfectants labeling contains uses as pesticides and as cleaners.

Background (cont'd)

- OPP and OPPTS DfE agreed to work together to determine the feasibility of allowing products that have passed the DfE review to submit a label amendment to OPP in order place the logo on pesticide products.

Previous Products

- DfE sent OPP 3 previous products for review that passed their review.
- OPP sent 8 products to DfE for review.
  - The products forwarded by OPP ranged from acute tox classification I-IV.
  - The products forwarded by OPP contained different active ingredients.
  - The products forwarded by OPP involved different use sites.

Issues That Arose

- OPP staff were required to complete TSCA CBI training before DfE could provide records.
- DfE staff were required to complete FIFRA CBI training before OPP could provide records.
- OPP expanded participation to include RD, BPPD, FEAD, and HED.

Issues that Arose (cont'd)

- Question as to whether or not EFED also needs to be involved.
- There was a need to bring new workgroup members "up to speed".
- Of the 3 previous products reviewed by DfE, OPP had classified 1 as acute tox I.

Draft - Facts to Consider

- No carcinogens
- No acute tox I or II products
- No unresolved 6(a)(2) issues
- No unresolved efficacy failures
- No current enforcement action
- Only OPP approved statements could be made regarding the logo.

Draft - Facts to Consider (cont'd)

- No products with unapproved inerts
- No outstanding "conditional registration" data issues
- No PPE required to use the product
- No developmental tox issues
- The complete product formulation would be reviewed – individual components and final formulation

Next Steps

- Next meeting is scheduled for April 15, 2009.
- AD, HED, and RD will develop a side-by-side analysis of the DfE and OPP review process.
- DfE science staff will provide a presentation to OPP science staff.
- Finalize the “Factors to Consider”.

Questions?